

## **Modern slavery statement for financial year ended 31 December 2016**

This statement is made by Concordia International Rx (UK) Limited on behalf of itself and all companies in the Concordia International Corp. group (collectively referred to as “Concordia International”).

Concordia International is committed to maintaining the highest ethical standards in its dealings with all parties involved in the company’s business activities, including employees, vendors, contractors and third parties. As an example of this commitment, Concordia International was the first pharmaceutical company worldwide to be certified by the British Standards Authority for its anti-bribery management system (BSI 10500).

This statement sets out the steps that Concordia International has taken, and is continuing to take, to ensure that modern slavery and human trafficking are not taking place in any of our supply chains or in any part of our own business.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to ensure that all our business operations are conducted in accordance with applicable laws, regulations, industry codes and norms.

### Our business

We operate an international specialty pharmaceutical business, owning a broad portfolio of branded and generic prescription products that are sold to wholesalers, hospitals and pharmacies in over 90 countries. Concordia International specializes in the acquisition, licensing and development of off-patent prescription medicines, which may be niche, hard-to-make products. Concordia International’s medicines are manufactured and sold through an out-sourced manufacturing network and marketed internationally through a combination of direct sales and local distribution relationships. Concordia International’s diversified product portfolio consists of more than 200 products, representing a variety of dosage strengths, formulations and geographic markets and covering a range of therapeutic categories, including endocrinology, neurology, ophthalmology and urology.

### Our policies

We operate a number of policies to ensure that we conduct our business in compliance with all applicable laws and regulations and in an ethical and transparent manner. These include:

1. A Code of Conduct, applicable to all parts of the Concordia International Corp. group.
2. A Business Partner Appointment and Management Policy, described below.
3. An Anti-Bribery and Corruption Policy.
4. Recruitment policies – our policies set clear standards and processes regarding the selection and appointment of all staff, including conducting eligibility checks to safeguard against human trafficking and against individuals being forced to work against their will.
5. A Whistleblowing policy. Openness is one of our core values. All employees know that they can raise concerns about how colleagues are being treated, or about practices within our business or supply chain, without fear of reprisals.

**Concordia International Rx (UK) Limited**

Capital House, 85 King William Street, London EC4N 7BL United Kingdom.

T: +44 (0) 208 588 9100 F: +44 (0) 208 588 9200 E: [enquiries@concordiarx.com](mailto:enquiries@concordiarx.com) W: [www.concordiarx.com](http://www.concordiarx.com)

Company No. 4678629

In addition, integrity is one of our core values and forms a part of every employee's performance management process.

#### Appointment and Management of Business Partners

Our Business Partner Appointment and Management Policy applies to all legal and natural persons working for us including, but not limited to, Commission-based sales agents, Distributors or Resellers ("Partners"). The purpose of this policy and its procedures is to ensure the orderly appointment and management of all Partners and to enable risk-based and informed decisions to be made on the appointment and management of Partners.

We conduct due diligence on our Partners to satisfy ourselves that child labour, slavery, servitude and forced or compulsory labour and human trafficking are not taking place in any part of their business.

We regularly conduct training for our employees on the principles of the Modern Slavery Act. This training is included in employees' induction training and in annual refresher training.

#### Our performance indicators

We take a range of measures to monitor the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or Partners, including:

- regular dialogue with our business partners;
- ongoing performance management processes with our employees; and
- regular review of the effectiveness of our policies and process.

#### Looking ahead

Concordia is committed to continuously improving the way it manages its business operations. As part of this commitment we will continue to review and improve our policies, processes and controls to ensure that modern slavery and human trafficking do not take place in any of our supply chains or our own business.

#### Approval for this statement

This statement has been approved by the Board of Directors of Concordia International Rx (UK) Limited on behalf of that company and its UK affiliates which carry on business in the UK.

A handwritten signature in black ink, appearing to read "G. Duncan", is written over a horizontal dotted line.

Graeme Duncan

President, Concordia International (ex-US & Canada) segment

Date: 30/6/2017